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Attorneys for Defendants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

11 A.H., a minor, individually and as) Case No.: 2:22-CV-03671 WLH (ASx)
12 successor in interest to decedent,)
13 Richard Hayes, by and through his)
14 Guardian ad Litem, Tiffany Hayes;)
15 S.H., a minor, individually and as)
16 successor in interest to decedent,)
17 Richard Hayes, by and through her)
18 Guardian ad Litem, Tiffany Hayes;)
19 and TIFFANY HAYES, individually,)
20 Plaintiffs,)
vs.)
COUNTY OF LOS ANGELES, and)
DOES 1 to 10, inclusive,)
Defendants.)
JOINT STATUS REPORT RE
SETTLEMENT

22 COME NOW Plaintiffs Tiffany Hayes, A.H., and S.H., and Defendants
23 County of Los Angeles, and Deputies Carlos De La Torre, Alex Valdivia and Janet
24 Huoth and, pursuant to the Court's order dated July 8, 2024 (Dkt. 93), hereby
25 submit the following joint status report regarding their mediation.

26 1. On June 21, 2023, the parties participated in mediation with mediator
27 Rick Copeland. At the conclusion of the mediation, Mr. Copeland made a
28 mediator's proposal, which the parties accepted.

1 2. In light of the parties' acceptance of the mediator's proposal, the
2 parties have reached a conditional settlement that resolves this case in its entirety.
3 The proposed settlement is conditioned upon the approval by the relevant Los
4 Angeles County boards, including the Contract Cities Liability Trust Fund and
5 Board of Supervisors.

6 3. The settlement has now been approved by the Contract Cities
7 Liability Trust Fund. It is expected that the matter will be placed on the agenda for
8 approval by the Board of Supervisors in or before November 2024.

9 4. If the Board of Supervisors approves the settlement, the plaintiffs will
10 be filing a petition for approval of the compromise of the claims of the minor
11 plaintiffs. The plaintiffs anticipate filing the minors' compromise within 45 days of
12 the settlement's approval by the Board of Supervisors.

14 | DATED: October 4, 2024

LAW OFFICES OF DALE K. GALIPO

/s/ Renee V. Masongsong

By:

Dale K. Galipo
Renee V. Masongsong
Attorneys for Plaintiffs

20 | DATED: October 4, 2024

CARPENTER, ROTHANS & DUMONT LLP

/s/ Jill Williams

By:

Jill Williams
Kimberly Sarmiento
Attorneys for Defendants